

For example, during the course of this research it was discovered that reamer profiles that are suitable for hand juicing devices are not entirely suitable for motorized juicing. It was also specifically noted during the product development phase of the commercial product that embodies the invention that a reamer profile such as the one depicted in the cited design patent do not work well in a motorized citrus juicer in the absence of an effective fruit dome for stabilizing the interaction between the fruit and the reamer. The Examiner is urged not to jump to conclusions regarding the relevance and applicability of design patent 187451.

The Examiner has also made a fairly serious factual error regarding the interpretation of claim 17. Apparently, the Examiner has interpreted the applicant's recitation of a "four bar linkage" as some form of generic linkage. In fact, a four bar linkage is a specific mechanical moveable linkage. It consists of four rigid bodies (called bars or links) each attached to two others by single joints or pivots to form a closed loop. The Examiner is encouraged to consider the Wikipedia article <http://en.wikipedia.org/wiki/Four-barlinkage> website that graphically illustrates the complex motion of four bar linkages is provided at <http://www.softintegreation.com/chhtml/toolkit/mechanism/fourbar/>. Accordingly, none of the references is produced by the Examiner illustrate or even suggest the utility of fourbar linkage, particularly in regards to the motion of a fruit dome. Specifically, the applicant denies that US patent 4206345 discloses, teaches or suggests the utility of a fourbar linkage or any relevant aspects of the applicant's actuating arm.

Further, the Examiner's citation of US patent number 4378078 to Daniels is misplaced. Daniels is quite specifically a granulated material dispenser and has no bearing whatsoever on liquids or fruit juicing. The Examiner's proposition essentially is that any form of valve is suitable for any form of device. There is no reason why anyone in search of a solution in respect of a citrus juicer would consult the granulated materials handling art. There would certainly be more germane citations and the Examiner's encouraged to find one rather than rely on irrelevant art.

The Examiner contends that the term "trajectory" is unclear, specifically when used in the context of "a trajectory determined by the actuating arm". The Examiner is encouraged to consult the standard dictionary definition of the word "trajectory". A trajectory is a path

followed by an object moving through space. In this instance, the path is determined by the actuating arm. For this reason, the term "trajectory" is considered both perfectly clear and highly descriptive of the motion of the fruit dome. It is not understood why the Examiner has introduced the term "angle" into paragraph 5. Quite simply, the dome has a motion through space and this motion is its trajectory. The trajectory is recited as having two portions. A first portion of the trajectory is curved. As the fruit dome approaches the reamer however, the trajectory becomes increasingly linear. This motion is specifically recited in claim 9. The linear portion of the motion is a result of, for example, the fourbar linkage as taught by the specification. The linear portion of the trajectory causes the fruit to engage the reamer along a straight line rather than a curved one. Thus, the actuating arm disclosed in the specification provides both the benefits of a simple unsophisticated pivot system (specifically as shown in the Examiner's citation 4706559) and linear fruit dome motions as seen in less complicated linear motion versions of the prior art. The Examiner should note that the curved, pinching motion provided by the fruit dome in 4706559 is specifically the kind of motion that the present invention improves so dramatically on. The Examiner will note that in 4706559, the trajectory of the dome is entirely accurate because it is determined entirely by the rigid pivoting connection between the dome and the single pivot (35). An actuating arm of this kind is not capable of imparting a linear portion to the trajectory of the dome. The applicant specifically rejects the proposition that the trajectory depicted in 4706559 has or is capable of having a linear portion. The Examiner is urged to re-consider.

A favourable re-consideration is requested. Please charge any deficiency in the fees due to our Deposit Account No. 503458 in the name of Molins & Co.

Regards,



Michael Molins
Reg. No. 31785
Customer No. 33372

Encl: Amended Claims